

ROLLIN BRASWELL FISHER LLC  
8350 E. Crescent Parkway, Suite 100  
Greenwood Village, CO 80111  
Telephone: (303) 945-7415  
Facsimile: (303) 974-7468  
Michael A. Rollin

Attorneys for Lehman Brothers Holdings Inc.  
And Certain of Its Affiliates

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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	:
<b>In re</b>	:
	:
<b>LEHMAN BROTHERS HOLDINGS INC., et al.,</b>	:
	:
<b>Debtors.</b>	:
	:
-----X	

**Chapter 11 Case No.**  
**08-13555 (SCC)**  
**(Jointly Administered)**

**CERTIFICATE OF NO OBJECTION  
UNDER 28 U.S.C. § 1746 REGARDING THE PLAN ADMINISTRATOR'S  
MOTION TO DISALLOW AND EXPUNGE CLAIM NUMBER 32168**

Pursuant to 28 U.S.C. § 1746, and in accordance with this Court's case management procedures set forth in the Second Amended Order Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rules 1015(c) and 9007 Implementing Certain Notice and Case Management Procedures [ECF No. 9635] (the "Second Amended Case Management Order"), the undersigned hereby certifies as follows:

1. On August 5, 2016, Lehman Brothers Holdings Inc. (the "Plan Administrator"), as Plan Administrator under the *Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and its Affiliated Debtors*, filed Debtors' Motion to Disallow and Expunge Claim No. 32168 [ECF No. **53453**] (the "Claim Motion") with the Court for hearing.

2. In accordance with the Second Amended Case Management Order, the Plan Administrator established a deadline (the "Response Deadline") for parties to object or file responses to the Claims Objection. The Response Deadline was set for September 6, 2016, at 4:00 p.m. The Second Amended Case Management Order provides that pleadings may be granted without a hearing, provided that no objections or other responsive pleadings have been filed on or prior to the relevant response deadline and the attorney for the entity who filed the pleading complies with the relevant procedural and notice requirements.

3. The Response Deadline has now passed. To the best of my knowledge, no responsive pleadings have been (a) filed with the Court on the docket of the above-referenced cases in accordance with the procedures set forth in the Second Amended Case Management Order, or (b) served on counsel to the Plan Administrator. Accordingly, the Plan Administrator respectfully requests that the proposed order granting the Claims Objection, annexed hereto as Exhibit A, be entered in accordance with the procedures described in the Second Amended Case Management Order.

I declare that the foregoing is true and correct.

Dated: September 15, 2016

/s/ Michael A. Rollin

Michael A. Rollin  
ROLLIN BRASWELL FISHER LLC  
8350 E. Crescent Parkway, Suite 100  
Greenwood Village, CO 80111  
Telephone: (303) 945-7415  
Facsimile: (303) 974-7468

*Attorneys for Lehman Brothers Holdings Inc.  
And Certain of Its Affiliates*

**Exhibit A**

Proposed Order

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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	:
<b>In re</b>	: <b>Chapter 11 Case No.</b>
	:
<b>LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i>,</b>	: <b>08-13555 (SCC)</b>
	:
<b>Debtors.</b>	: <b>(Jointly Administered)</b>
	:
-----X	

**ORDER GRANTING MOTION TO DISALLOW AND EXPUNGE  
CLAIM NUMBER 32168**

Upon the Debtors’ Motion to Disallow and Expunge Claim Number 32168, dated August 5, 2016 (the “Claim Motion”), of Lehman Brothers Holdings Inc., as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and its Affiliated Debtors, seeking to disallow and expunge Claim No. 32168, pursuant to section 502(b) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, this Court’s Order Establishing A Protocol To Resolve Claims Filed By Trustees On Behalf Of Certain Issuers Of Residential Mortgage-Backed Securities (the “Protocol Order” and the protocol approved thereby, the “RMBS Claims Protocol” or “Protocol”) (ECF No. 47569), and this Court’s Order Granting the Motion of RMBS Trustees to Extend the Overall Claim File Cut-Off Date for Certain Loans Under the Protocol Order and Related Relief (the “Protocol Extension Order”) (ECF No. 52367), all as more fully described in the Claim Motion; and due and proper notice of the Objection to Claim having been provided as stated therein, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Objection to Claim is in the best interests of the Chapter 11 Estates, their creditors, and all parties in interest, and that the legal and factual bases set forth in the Objection

to Claim establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the relief requested in the Debtors' Motion to Disallow and Expunge Claim Number 32168 is granted; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code and Rule 3007 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), Claim No. 32168 is disallowed and expunged in its entirety with prejudice; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: \_\_\_\_\_, 2016  
New York, New York

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UNITED STATES BANKRUPTCY JUDGE